ROBINSON, McFadden & Moore, P.C.





ATTORNEYS AND COUNSELORS AT LAW

DAVID W. ROBINSON, II JOHN S. TAYLOR, JR. DANIEL T. BRAILSFORD FRANK R. ELLERBE, III THOMAS W. BUNCH, II J. KERSHAW SPONG D. CLAY ROBINSON R. WILLIAM METZGER, IR.** KEVIN K. BELL Annemarie B. Mathews † BONNIE D. SHEALY CHARLES H. McDonald MARGARET R. SCOOPMIRE Erin A. Cook M. KEVIN GARRISON

** Certified Specialist in Bankruptcy and Debtor-Creditor Law

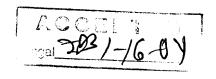
† Also Admitted in North Carolina

L. JEFFERSON DAVIS, IV

DAVID W. ROBINSON (1869-1935) DAVID W. ROBINSON, JR. (1899-1989)J. MEANS McFadden (1901-1990) THOMAS T. MOORE RETIRED JAMES M. BRAILSFORD, III RETIRED



Founding Member

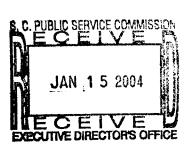


January 14, 2004

Honorable Mr. Bruce Duke **Acting Executive Director** Public Service Commission of South Carolina Synergy Business Park, Saluda Building 101 Executive Center Drive Columbia, South Carolina 29210

> SCCTA/USF 2003 Re: Case No. 1997-0239-C

Dear Mr. Duke:





As counsel for the South Carolina Cable Television Association. which is a participating party in the upcoming Universal Service Fund hearing. I have recently been served revised pre-filed testimony on behalf of six of the seven Local Exchange Companies which are seeking more money from the fund. These revisions were submitted in violation of the Commission's pre-filing order and we object.

The first of the supplemental submissions was a revision of the testimony and exhibits of Emmanuel Staurulakis on behalf of Bluffton Telephone Company, Inc., Hargray Telephone Company, Inc., Home Telephone Company, Inc., Horry Telephone Cooperative, Inc. and PBT Telecom. In the revised version of Mr. Staurulakis' testimony an Exhibit C has been added which is a five page exhibit consisting of a detailed spreadsheet for each of Mr. Staurulakis' clients purporting to show various USF related calculations. None of this financial information was included in the original version of Mr. Staurulakis' testimony which was timely filed.

Alltel has also revised testimony of one of its witnesses. In the original, timely filed version of the testimony of Rohan Ranaraja, we are told that Alltel is seeking to recover money from the USF as part of the "second step" of the "Initial Phase." In the revised testimony of Mr. Ranaraja we are now told that Alltel is seeking to take money as part of the "Second Phase."

The revisions of testimony of both these witnesses have been submitted after the applicable deadline for pre-filing their testimony. No motions have been filed seeking to extend the time for pre-filing this testimony. The revisions are substantive and have not been made solely for the purpose of correcting typographical errors. For these reasons we object to these revisions and will oppose introduction of the revised versions of the testimony of Ranaraja and Staurulakis at the upcoming hearing scheduled in the matter.

Very truly yours,

ROBINSON, McFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/abw

CC: All parties of record